



Board of Directors

Charles Clusen
Chair

Lorraine Duvall
Dale Jeffers
Michael Wilson
Vice-Chairs

Kenneth Strike
Secretary

David Quinn
Treasurer

Nancy Bernstein
Anya Bickford
Peter Borrelli
John Caffry
Dean Cook
Mary Lou Doulin
Robert Glennon
Evelyn Greene
Sidney Haring
Robert Harrison
Bill Healy
Peter Hornbeck
Maryde King
Charles Morrison
Peter O'Shea
Marilyn Sargent

Peter Bauer
Executive Director

April 26, 2013

Lani Ulrich, Chair
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

Dear Chairwoman Ulrich,

Protect the Adirondacks has been monitoring the work of the Adirondack Park Agency (APA) as it examines whether or not to finalize a new General Permit for large clearcuts on various lands across the Adirondack Park. The APA has heard from industry, academics with strong industry ties, experts on various "sustainable forestry" certification programs, as well as its staff. The APA has administered a public hearing and issued and re-issued a Negative Declaration under SEQRA. The messages the APA has received have largely been the industry side of things.

Now that the snow is gone and spring is near, PROTECT urges the APA Board of Commissioners to get out into the field and look at the impacts of existing clearcuts. PROTECT has identified five locations, in relatively close proximity, where extensive "small" clearcutting has occurred. We believe these sites would be excellent for field visits to examine regeneration and the various other impacts from clearcutting.

Field Visit to Assess Regeneration in Existing Clearcuts

One reason the APA uses repeatedly to support the necessity of the new General Permit to make it easier for big clearcuts of over 25 acres in size is that this practice will enhance forest regeneration. From what PROTECT has observed, this is a dubious proposition.

PROTECT sees many obstacles to healthy forest regeneration through big clearcuts. To fully investigate this issue, PROTECT encourages the APA Board of Commissioners to spend a day visiting existing clearcuts in the Adirondack Park. PROTECT has attached pictures of five locations within the towns of Colton and Piercefild where the APA could visit existing clearcuts and look first-hand at regeneration success or failure. These clearcuts vary in ages and many of the block clearcuts are accompanied by extensive strip clearcuts. PROTECT encourages this field trip to be open to the public, media, and interested persons and organizations.

Protect the Adirondacks

PO Box 769, Lake George, NY 12845 518.685.3088
www.protectadks.org info@protectadks.org



APA Needs a Broader Perspective to Examine Decision to Streamline Clearcutting Rules

In March, the APA heard from SUNY-ESF professor Rene Germain talk about his experiences as a forester associated with the management of the Ward Lumber forestlands. The APA extrapolated lessons from his presentation to its decision on the General Permit for clearcutting. The differences between the Ward Lumber lands and the industrial forestlands where the General Permit will be used most heavily are significant. Here are just a few of the differences:

1. Ward Lumber has been managed for the long-term to supply high quality saw logs to its mill, whereas the industrial forestlands have been managed for the short-term to primarily provide low quality logs for pulp, chipping, and other uses.
2. Ward lumber is a family business where multiple generations have practiced long-term forestry, whereas the industrial forestlands are managed for short-term maximum extraction in 10- or 15-year management cycles.
3. Ward Lumber does not use heavy equipment on its lands during harvests and the Germain presentation showed a well known local logger with his chainsaw, whereas the industrial forestlands are harvested by multi-ton feller bunchers. See a picture above of whole-tree harvesting and juxtapose this with the image of one logger with his chainsaw from the Germain presentation. The scales and impacts are wholly different.

4. Ward Lumber does not practice whole-tree harvesting, but leaves tops and limbs in the forests to provide nutrients and wildlife habitat, whereas the industrial forestland owners practice whole-tree harvesting that removes everything.
5. Ward Lumber showed what can be accomplished by long-term forestry that practices stand level, uneven-aged management as opposed to industrial forestland management practices of largescale clearcutting of even-aged trees, whether in small blocks or long strips.

These are just a few of the significant differences in management between Ward Lumber and the large-scale industrial forest management . It's disingenuous for the APA Board to extrapolate lessons and results from one of the most exemplary long-term private commercial forests in the Adirondack Park and equates this management with the current short-term industrial forest management. The APA needs to look closely at the on-the-ground management of industrial forestlands, especially the FSC/SFI-certified conservation easement lands.

Continuing Shortfalls with the Negative Declaration

A joint letter was submitted to the APA on April 10, 2013 by a number of organizations detailing the weaknesses to the APA's revised SEQRA Negative Declaration. PROTECT continues to hold to the position that a Negative Declaration is a wholly inappropriate tool for a new policy that will impact hundreds of thousands of acres.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to provide these comments on this important matter.



Peter Bauer
Executive Director

CC Hon. Andrew Cuomo
 A. Zambelli, Executive Chamber
 J. Malatras, Executive Chamber
 B. Seggos, Executive Chamber
 J. Martens, NYSDEC
 K. Moser, NYSDEC
 C. Ballantyne, NYSDEC
 APA Commissioners
 R. Weber, NYSAPA

Hon. R. Duffy, Executive Chamber
H. Glaser, Executive Chamber
R. Rosenthal, Executive Chamber
L. Schwartz, Executive Chamber
M. Gerstman, NYSDEC
R. Davies, NYSDEC
T. Martino, NYSAPA
J. Townsend, NYSAPA



Small clearcuts in blocks in the Long Pond conservation easement area. These lands have also seen strip clearcutting. These lands are in Town of Colton, St. Lawrence County, close to Route 56.



Small clearcuts in blocks in the Carry Falls conservation easement area. These lands have also seen strip clearcutting. These lands are in Town of Colton, St. Lawrence County, , close to Route 56



Small clearcuts in blocks in the Conifer conservation easement area. These lands have also seen strip clearcutting. These lands are in Town of Colton, St. Lawrence County, south of Route 3.



Small clearcuts in blocks on conservation easement lands north of the Raquette River. These lands have also seen strip clearcutting. These lands are in Town of Piercefield, St. Lawrence County, north of Route 3.



Small clearcuts in blocks on conservation easement lands south of the Raquette River. These lands have also seen strip clearcutting. These lands are in Town of Piercefield, St. Lawrence County, north of Route 3.